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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
C-07-2688

SKYWEST PILOTS ALPA ORGANIZING
COMMITTEE, *et al.*,

Plaintiffs,

vs.

SKYWEST AIRLINES, INC.,

Defendant.

CASE NO.:

DECLARATION OF
RIAD MANSUR IN SUPPORT OF
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION

Declaration of Riad Mansur

1. My name is Riad Mansur. I have been an airline pilot employed by SkyWest Airlines since January, 2005. I currently serve as an RJ captain based in Chicago, Illinois.

2. I have been and remain an open and active member of the SkyWest Pilots ALPA Organizing Committee (the "OC"), which was formed to encourage the pilots of SkyWest to elect ALPA as their collective bargaining representative. The pilots of SkyWest are not represented by a labor union for collective bargaining purposes.

3. In early spring of 2006, we made ALPA literature available to other pilots in the crew room. We heard a rumor that management had been told to remove ALPA literature from the crew rooms. Soon after that, Kelly Riley, Chief Flight Attendant in Chicago, approached the table where I was sitting in the front portion of the crew room at O'Hare International Airport and chatted briefly with me and another crew member sitting nearby. At the same time, ignoring the

pile of newspapers on the table, Ms. Riley picked up the ALPA flier that was next to them, crumpled it up and threw it away.

3. My first conflict with management was over my wearing of an ALPA lanyard. ALPA, the Air Line Pilots Association, Intl., provided the OC with dark-colored lanyards with the phrase "Air Line Pilots Association, Int'l." stamped on them with white ink. When the campaign began, ALPA handed out lanyards to OC members and other pilot supporters who wanted to show support for ALPA and the OC. The lanyards also served as a way to identify like-minded pilots.

4. Soon after pilots began wearing the ALPA lanyards, I began hearing from fellow pilots that they had been asked by management representatives to remove ALPA lanyards when they were in uniform. In May of 2006, I walked into the SkyWest crew room at O'Hare International Airport to check in for work. Upon entering the crew room, Capt. Roy Glassey, Chief Pilot at O'Hare, tapped my shoulder and told me to come into his office. He also instructed another pilot to join us. Once both pilots were in the office, he said he


had something for us and handed each of us a plain, black lanyard to wear. Before we left the office, we switched our identification from our own lanyards to the ones provided by Capt. Glassey.

5. As a result of this encounter with Capt. Glassey, I have stopped wearing my ALPA lanyard. I still regularly see pilots in the crew room with logo lanyards representing various sports teams, colleges, and so forth.

6. I have also worked with Capt. Marc Johnson to place fliers on message boards in the crew room at O'Hare to inform other pilots of ALPA informational sessions being held elsewhere in the airport. Whenever we have placed a flier on the SAPA (SkyWest Airlines Pilot Association) message board, it has been removed within a day or two. SAPA is an organization of pilots, developed and supported by the company, which purports to speak on behalf of the pilots to management. As a general matter, signs posted on the common message boards open to all ads and solicitations have not been removed.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

5-5-2007
Date


Riad Mansur